1 FILED CLERK, U.S. DISTRICT COURT 2 3 06/08/2022 4 CENTRAL DISTRICT OF CALIFORNIA BY: DEPUTY 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA 10 April 2022 Grand Jury 11 UNITED STATES OF AMERICA, ED CR No. 5:22-cr-00140-MCS 12 Plaintiff, I N D I C T M E N T 13 v. [18 U.S.C. \$922(a)(1)(A):Engaging in the Business of 14 CHRISTOPHER SEBASTIAN QUEZADAS, Dealing in Firearms Without a aka "Fifty," and License; 18 U.S.C. § 922(q)(1): 15 ANGEL RENE MENDOZA, Felon in Possession of Firearms and Ammunition; 18 U.S.C. 16 Defendants. § 922(o)(1): Possession of Machineguns; 21 U.S.C. 17 \$\$ 841(a)(1), (b)(1)(A)(viii): Possession with Intent to Distribute and Distribution of 18 Methamphetamine; 18 U.S.C. 19 \$924(c)(1)(A)(i): Possession of aFirearm in Furtherance of a Drug 20 Trafficking Crime; 21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. 21 § 2461(c): Criminal Forfeiture] 22 23 The Grand Jury charges: 24 COUNT ONE 25  $[18 \text{ U.S.C.} \S 922(a)(1)(A)]$ 26

Beginning on or about February 2, 2022, and continuing through on or about May 26, 2022, in Los Angeles and Riverside Counties,

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[DEFENDANT QUEZADAS]

within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," not being licensed as an importer, manufacturer, or dealer of firearms, willfully engaged in the business of dealing in firearms, specifically, the sales of the following firearms, including privately made firearms bearing no serial number (commonly referred to as "ghost guns"), on or about the following dates:

Date	Firearms
February 7, 2022	1. A Ruger, Model P94DC, .40 caliber pistol, bearing serial number 340-81544;
	2. A Glock, Model 23, .40 caliber pistol, bearing serial number AFTG799; and
	3. A Taurus, Model Ultralite, .38 caliber revolver, bearing serial number LS 87674.
February 16, 2022	<ol> <li>A Rock Island Armory, Model M1911-A1 FS, .45 caliber pistol, bearing serial number RIA2477581;</li> </ol>
	<ol> <li>A Rock Island Armory, Model M1911-A1 FS, .45 caliber pistol, bearing serial number RIA2477248;</li> </ol>
	3. A Rock Island Armory, Model M1911-A1 FS, .45 caliber pistol, bearing serial number RIA2477258;
	4. A Taurus, Model G2C, 9mm caliber pistol, bearing serial number ACL532731;
	5. A Ruger, Model EC9S, 9mm caliber pistol, bearing serial number 461-12133; and
	6. Two privately manufactured, M16-type, 7.62mm caliber rifles, both of which were machineguns.

1	Date	Firearms
2	February 18, 2022	1. A Sig Sauer, Model P320, 9mm caliber
3		pistol, bearing serial number 58B134117;
4		2. A Sig Sauer, Model P320, 9mm caliber pistol, bearing serial number 58K099065;
5		3. A Sig Sauer, Model P365 XL, 9mm caliber
6		pistol, bearing serial number 66B323543;
7 8		4. A Sig Sauer, Model P365 XL, 9mm caliber pistol, bearing serial number 66B312364;
9		5. A Smith & Wesson, Model M&P 9, 9mm caliber pistol, bearing serial number HNN3626;
10		6. A Glock, Model 43, 9mm caliber pistol,
11		bearing serial number ZWW954;
12 13		7. A CZ, Model P-09, 9mm caliber pistol, bearing serial number B645203;
14		8. A Colt, Model Cobra, .38 caliber revolver, bearing serial number RA557652;
15 16		9. A privately manufactured 9mm caliber pistol; and
17 18		10. Three privately manufactured .40 caliber pistols.
19	February 24, 2022	1. A Taurus, Model G3C, 9mm caliber pistol,
20	CDI daily 21, 2022	bearing serial number ACK427101;
21		2. A Rock Island Armory, Model 1911, .45 caliber pistol, bearing serial number
22		RIA2169877;
23		3. A Smith & Wesson, Model M&P 40C, .40
24		caliber pistol, bearing serial number HSC5245; and
25		4. Four privately manufactured, M16-type,
26		5.56 caliber rifles, all of which were machineguns.
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1	Date	Firearms
2	March 2, 2022	A Rock Island Armory, Model 1911, .45 caliber
3		pistol, bearing serial number RIA904762
4 5	March 17, 2022	1. A Rock Island Armory, Model M1911-A1 CS, .45 caliber pistol, bearing serial number RIA2418925;
6 7		2. A Rock Island Armory, Model M1911-A1 CS, .45 caliber pistol, bearing serial number RIA2477123;
8		3. A Star, Model Firestar, .40 caliber
9		pistol, bearing serial number 2018222;
10		4. A Colt, Model Compact, .45 caliber
11		pistol, bearing serial number CP33977; and
12		5. An Elk River, Model ERTD, 7.62x39mm
13		caliber rifle, bearing serial number CC1665.
14	26 0000	
15	May 26, 2022	1. An FNH, Model 503, 9mm caliber pistol, bearing serial number CV021381;
16 17		2. A Taurus, Model PT99AF, 9mm caliber pistol, bearing serial number THD23180;
18		3. A Ruger, Model Security Six, .357 caliber
19		revolver, bearing serial number 15429082;
20		4. A Colt, Model Python, .357 caliber revolver, bearing serial number PY027499;
21		5. 13 privately manufactured 9mm caliber
22		pistols;
23		6. Two privately manufactured .40 caliber pistols; and
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25		7. Two privately manufactured pistols of unknown caliber.
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COUNT TWO 1  $[18 \text{ U.S.C.} \S 922(g)(1)]$ 2 3 [DEFENDANT QUEZADAS] On or about February 7, 2022, in Los Angeles County, within the 4 5 Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed the following 6 7 firearms, in and affecting interstate and foreign commerce: 8 A Ruger, Model P94DC, .40 caliber pistol, bearing serial 9 number 340-81544; 10 2. A Glock, Model 23, .40 caliber pistol, bearing serial 11 number AFTG799; and A Taurus, Model Ultralite, .38 caliber revolver, bearing 12 serial number LS 87674. 13 14 Defendant QUEZADAS possessed such firearms knowing that he had 15 previously been convicted of a felony crime punishable by a term of 16 imprisonment exceeding one year, namely, Possession of Cocaine While Armed, in violation of California Health and Safety Code Section 17 18 11370.1(a), in the Superior Court of the State of California, County 19 of Los Angeles, case number NA109772, on or about August 23, 2018. 20 21 22 23 24 25 26

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COUNT THREE

[18 U.S.C. § 922(g)(1)]

## [DEFENDANT QUEZADAS]

On or about February 16, 2022, in Los Angeles County, within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed the following firearms, in and affecting interstate and foreign commerce:

- 1. A Rock Island Armory, Model M1911-A1 FS, .45 caliber pistol, bearing serial number RIA2477581;
- 2. A Rock Island Armory, Model M1911-A1 FS, .45 caliber pistol, bearing serial number RIA2477248;
- 3. A Rock Island Armory, Model M1911-A1 FS, .45 caliber pistol, bearing serial number RIA2477258;
- 4. A Taurus, Model G2C, 9mm caliber pistol, bearing serial number ACL532731; and
- 5. A Ruger, Model EC9S, 9mm caliber pistol, bearing serial number 461-12133.

Defendant QUEZADAS possessed such firearms knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Possession of Cocaine While Armed, in violation of California Health and Safety Code Section 11370.1(a), in the Superior Court of the State of California, County of Los Angeles, case number NA109772, on or about August 23, 2018.

COUNT FOUR

[18 U.S.C. § 922(o)(1)]

[DEFENDANT QUEZADAS]

On or about February 16, 2021, in Los Angeles County, within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed machineguns, as defined in Title 18, United States Code, Section 921(a)(23), and Title 26, United States Code, Section 5845(b), namely, two privately manufactured, M16-type, 7.62mm caliber rifles (commonly referred to as "ghost guns"), each of which defendant QUEZADAS knew to be a machinegun.

COUNT FIVE

[18 U.S.C. § 922(g)(1)]

## [DEFENDANT QUEZADAS]

On or about February 18, 2022, in Los Angeles County, within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed the following firearms, in and affecting interstate and foreign commerce:

- 1. A Sig Sauer, Model P320, 9mm caliber pistol, bearing serial number 58B134117;
- 2. A Sig Sauer, Model P320, 9mm caliber pistol, bearing serial number 58K099065;
- 3. A Sig Sauer, Model P365 XL, 9mm caliber pistol, bearing serial number 66B323543;
- 4. A Sig Sauer, Model P365 XL, 9mm caliber pistol, bearing serial number 66B312364;
- 5. A Smith & Wesson, Model M&P 9, 9mm caliber pistol, bearing serial number HNN3626;
- 6. A Glock, Model 43, 9mm caliber pistol, bearing serial number ZWW954;
- 7. A CZ, Model P-09, 9mm caliber pistol, bearing serial number B645203; and
- 8. A Colt, Model Cobra, .38 caliber revolver, bearing serial number RA557652.

Defendant QUEZADAS possessed such firearms knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Possession of Cocaine While Armed, in violation of California Health and Safety Code Section

11370.1(a), in the Superior Court of the State of California, County of Los Angeles, case number NA109772, on or about August 23, 2018. 

COUNT SIX 1  $[18 \text{ U.S.C.} \S 922(g)(1)]$ 2 3 [DEFENDANT QUEZADAS] On or about February 24, 2022, in Riverside County, within the 4 5 Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed the following 6 7 firearms, in and affecting interstate and foreign commerce: 8 A Taurus, Model G3C, 9mm caliber pistol, bearing serial 9 number ACK427101; 10 2. A Rock Island Armory, Model 1911, .45 caliber pistol, 11 bearing serial number RIA2169877; and 12 3. A Smith & Wesson, Model M&P 40C, .40 caliber pistol, bearing serial number HSC5245. 13 14 Defendant QUEZADAS possessed such firearms knowing that he had 15 previously been convicted of a felony crime punishable by a term of 16 imprisonment exceeding one year, namely, Possession of Cocaine While Armed, in violation of California Health and Safety Code Section 17 18 11370.1(a), in the Superior Court of the State of California, County 19 of Los Angeles, case number NA109772, on or about August 23, 2018. 20 21 22 23 24 25 26

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COUNT SEVEN

[18 U.S.C. § 922(o)(1)]

[DEFENDANT QUEZADAS]

On or about February 24, 2021, in Riverside County, within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed machineguns, as defined in Title 18, United States Code, Section 921(a)(23), and Title 26, United States Code, Section 5845(b), namely, four privately manufactured, M16-type, 7.62mm caliber rifles (commonly referred to as "ghost guns"), each of which defendant QUEZADAS knew to be a machinegun.

COUNT EIGHT

[18 U.S.C. § 922(g)(1)]

[DEFENDANT QUEZADAS]

On or about March 2, 2022, in Riverside County, within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed a firearm, namely, a Rock Island Armory, Model 1911, .45 caliber pistol, bearing serial number RIA904762, in and affecting interstate and foreign commerce.

Defendant QUEZADAS possessed such firearm knowing that he had previously been convicted of a felony crime punishable by a term of imprisonment exceeding one year, namely, Possession of Cocaine While Armed, in violation of California Health and Safety Code Section 11370.1(a), in the Superior Court of the State of California, County of Los Angeles, case number NA109772, on or about August 23, 2018.

COUNT NINE 1 [18 U.S.C. § 922(g)(1)] 2 3 [DEFENDANT QUEZADAS] On or about March 17, 2022, in Riverside County, within the 4 5 Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly possessed the following 6 7 firearms, in and affecting interstate and foreign commerce: 8 A Rock Island Armory, Model M1911-A1 CS, .45 caliber 9 pistol, bearing serial number RIA2418925; 10 A Rock Island Armory, Model M1911-A1 CS, .45 caliber 11 pistol, bearing serial number RIA2477123; A Star, Model Firestar, .40 caliber pistol, bearing serial 12 number 2018222; 13 14 A Colt, Model Compact, .45 caliber pistol, bearing serial 15 number CP33977; 16 An Elk River, Model ERTD, 7.62x39mm caliber rifle, bearing 17 serial number CC1665. 18 Defendant QUEZADAS possessed such firearms knowing that he had 19 previously been convicted of a felony crime punishable by a term of 20 imprisonment exceeding one year, namely, Possession of Cocaine While 21 Armed, in violation of California Health and Safety Code Section 22 11370.1(a), in the Superior Court of the State of California, County 23 of Los Angeles, case number NA109772, on or about August 23, 2018. 24 25 26

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COUNT TEN [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)] [DEFENDANT QUEZADAS] On or about March 24, 2022, in Los Angeles County, within the Central District of California, defendant CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," knowingly and intentionally distributed at least fifty grams, that is, approximately 424 grams, of methamphetamine, a Schedule II controlled substance. 

COUNT ELEVEN [21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii); 18 U.S.C. § 2(a)] [ALL DEFENDANTS] On or about May 26, 2022, in Los Angeles County, within the Central District of California, defendants CHRISTOPHER SEBASTIAN QUEZADAS, also known as "Fifty," and ANGEL RENE MENDOZA, each aiding and abetting the other, knowingly and intentionally possessed with intent to distribute at least fifty grams, that is, approximately 13.15 kilograms, of methamphetamine, a Schedule II controlled substance. 

COUNT TWELVE

[18 U.S.C. \$924(c)(1)(A)(i)]

[DEFENDANT MENDOZA]

On or about May 26, 2022, in Los Angeles County, within the Central District of California, defendant ANGEL RENE MENDOZA knowingly possessed firearms, namely, a Smith & Wesson, Model M&P Shield 45, .45 caliber pistol, bearing serial number HYJ5043, and an HS Produkt, Model Hellcat, 9mm caliber pistol, bearing serial number BY568083, in furtherance of a drug trafficking crime, namely, Possession with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(viii), as charged in Count Eleven of this Indictment.

COUNT THIRTEEN

[18 U.S.C. § 922(g)(1)]

[DEFENDANT MENDOZA]

On or about May 26, 2022, in Los Angeles County, within the Central District of California, defendant ANGEL RENE MENDOZA knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

- 1. A Smith & Wesson, Model M&P Shield 45, .45 caliber pistol, bearing serial number HYJ5043;
- 2. An HS Produkt, Model Hellcat, 9mm caliber pistol, bearing serial number BY568083;
  - 3. Six rounds of Federal .45 caliber ammunition; and
  - 4. Approximately 13 rounds of Federal 9mm caliber ammunition.

Defendant MENDOZA possessed such firearms and ammunition knowing that he had previously been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

- 1. Vandalism, in violation of California Penal Code Section 594(a), in the Superior Court of the State of California, County of Los Angeles, case number BA460493, on or about March 8, 2018; and
- 2. Carrying a Concealed Firearm in a Vehicle, in violation of California Penal Code Section 25400(a)(1), in the Superior Court of the State of California, County of Los Angeles, case number BA460493, on or about March 8, 2018.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

- 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Nine, Twelve, or Thirteen of this Indictment.
- 2. Any defendant so convicted shall forfeit to the United States of America the following:
- (a) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and
- (b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).
- 3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the convicted defendant shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

2 [21 U.S.C. § 853; 18 U.S.C. § 924; 28 U.S.C. § 2461(c)]

- 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts Ten or Eleven of this Indictment.
- 2. Any defendant so convicted shall forfeit to the United States of America the following:
- (a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;
- (b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense;
- (c) All right, title, and interest in any firearm or ammunition involved in or used in any such offense; and
- (d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).
- 3. Pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), any defendant so convicted, shall forfeit substitute property if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located

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upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty. A TRUE BILL TRACY L. WILKISON United States Attorney Christina Shy for SMG, SCOTT M. GARRINGER Assistant United States Attorney Chief, Criminal Division JERRY C. YANG Assistant United States Attorney Chief, Riverside Branch Office JOHN A. BALLA Assistant United States Attorney